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Jun 03 2022

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

DANIEL HALPERN,

Defendant.

CASE NO.: CR 19-0413 EMC

**STIPULATION AND ~~[PROPOSED]~~ ORDER
TO MODIFY CONDITIONS OF RELEASE**

Defendant Daniel Halpern was released on U.S. Pretrial Services supervision on November 7, 2019. On September 11, 2020, Mr. Halpern pled guilty to Count One of the Indictment, a violation of 21 U.S.C. §§ 846, 841(a)(1) and (b)(1)(B). He is currently scheduled to appear before this Court for sentencing on August 31, 2022, at 2:00 p.m.

Mr. Halpern was released subject to the condition, amongst others, that he submit to periodic drug testing. Mr. Halpern has submitted to all requested drug tests since January 2020 and has never had a positive drug test. He has been compliant with all conditions of his release and has not incurred any violations. U.S. Pretrial Services Officer Sean Hamel describes Mr. Halpern as a “model client on supervision” and does not believe that continued drug testing is necessary.

At this time, the parties and U.S. Pretrial Services agree and stipulate that Mr. Halpern’s conditions of release be modified to remove the requirement that Mr. Halpern submit to periodic drug testing. Mr. Halpern will continue to abide by the previously-imposed conditions of his release set

1 forth in Docket 40.

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3 IT IS SO STIPULATED.

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5 Dated:

Respectfully submitted,

6 RAMSEY & EHRLICH LLP

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8 /S/

9 Amy Craig
Counsel for Daniel Halpern

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11 Dated:

Respectfully submitted,

12 STEPHANIE HINDS
United States Attorney

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14 /S/

15 Molly Smolen
Assistant United States Attorney

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17
18 **[~~PROPOSED~~] ORDER**

19 On stipulation of the parties, and good cause appearing, IT IS HEREBY ORDERED that
20 the conditions of release for Defendant Daniel Halpern shall be modified to remove the requirement
21 that he submit to periodic drug testing.

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23 **IT IS SO ORDERED.**

24 Dated: 6/3/2022

25 
26 THE HONORABLE LAUREL BEELER
27 UNITED STATES MAGISTRATE JUDGE
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